

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LEILA GREEN LITTLE, JEANNE
PURYEAR, KATHY KENNEDY, REBECCA
JONES, RICHARD DAY, CYNTHIA
WARING, AND DIANE MOSTER,

Plaintiffs,

v.

LLANO COUNTY, RON CUNNINGHAM, in
his official capacity as Llano County Judge,
JERRY DON MOSS, in his official capacity as
Llano County Commissioner, PETER JONES,
in his official capacity as Llano County
Commissioner, MIKE SANDOVAL, in his
official capacity as Llano County
Commissioner, LINDA RASCHKE, in her
official capacity as Llano County
Commissioner, AMBER MILUM, in her
official capacity as Llano County Library
System Director, BONNIE WALLACE, in her
official capacity as Llano County Library
Board Member, ROCHELLE WELLS, in her
official capacity as Llano County Library
Board Member, RHONDA SCHNEIDER, in
her official capacity as Llano County Library
Board Member, and GAY BASKIN, in her
official capacity as Llano County Library
Board Member,

Defendants.

**JOINT NOTICE REGARDING PLAINTIFFS’
MOTION FOR EXPEDITED DISCOVERY**

On June 3, 2022, the Court ordered “the parties to participate in a meet and confer to attempt to resolve [Plaintiffs’ Motion for Expedited Discovery (ECF No. 23)] without court intervention and to file a joint notice no later than June 7, 2022, identifying the issues that have been resolved and the remaining outstanding issues.” (ECF No. 35.) Pursuant to the Court’s June 3, 2022 Order, the parties hereby submit this joint notice informing the Court that the parties have reached an agreement and that there are no outstanding disputes over Plaintiffs’ expedited discovery requests.

Having met and conferred, the parties agree to the following:

1. Defendants hereby withdraw Defendants’ Response in Opposition to Plaintiffs’ Motion for Expedited Discovery (ECF No. 33);
2. Defendants shall produce documents and respond to Plaintiffs’ written discovery requests attached as Exhibits 1-3 to Plaintiffs’ Motion for Expedited Discovery (ECF No. 23-1 through 23-3) by **June 21, 2022**;
3. Defendants shall produce Defendant Jerry Don Moss, Defendant Amber Milum, and Defendant Bonnie Wallace for deposition by **June 30, 2022**, which will be limited to four hours each;
4. Obtaining this discovery does not prejudice Plaintiffs from later seeking additional discovery or deposing witnesses during the formal discovery phase of this litigation. By entering into this stipulation, the parties do not waive, and expressly reserve, the right to take all discovery to which they are entitled under the Federal Rules of Civil Procedure.

Dated: June 7, 2022

Respectfully submitted,

By: /s/ Ellen Leonida
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